

1 Steve Schulte (TX Bar No. 24051306)  
 2 *Appearance Pro Hac Vice*  
 3 John Raggio (CA Bar No. 338261)  
 4 Arati Furness (CA Bar No. 225435)  
 5 **NACHAWATI LAW GROUP**  
 6 5489 Blair Road  
 7 Dallas, Texas 75231  
 8 Telephone: (214) 890-0711  
 9 Fax Number: (214) 890-0712  
 10 Email: [schulte@ntrial.com](mailto:schulte@ntrial.com)  
 11 Email: [jraggio@ntrial.com](mailto:jraggio@ntrial.com)  
 12 Email: [afurness@ntrial.com](mailto:afurness@ntrial.com)

13 *Counsel for Plaintiff*

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

---

17 IN RE: UBER TECHNOLOGIES, INC., ) Case No. 3:23-md-03084-CRB  
 18 PASSENGER SEXUAL ASSAULT )  
 19 LITIGATION ) **DECLARATION OF STEVEN S.**  
 20 \_\_\_\_\_ ) **SCHULTE IN SUPPORT OF**  
 21 This Document Relates to: ) **NACHAWATI LAW GROUP**  
 22 *Jane Doe NLG (N.K.) v. Uber* ) **PLAINTIFFS' OPPOSITION TO**  
 23 *Technologies, Inc., et al., No. 3:25-cv-* ) **DEFENDANTS UBER**  
 24 *06217-CRB* ) **TECHNOLOGIES, INC., RASIER, LLC,**  
 25 \_\_\_\_\_ ) **AND RASIER-CA, LLC'S MOTION TO**  
 26 *Jane Doe NLG (B.D.) v. Uber* ) **DISMISS CASES FOR FAILURE TO**  
 27 *Technologies, Inc., et al., No. 3:25-cv-* ) **COMPLY WITH PTO 5**  
 28 *05972-CRB* )  
 29 \_\_\_\_\_ )  
 30 *Jane Doe NLG (M.E.) v. Uber* ) Judge: Honorable Charles R. Breyer  
 31 *Technologies, Inc., et al., No. 3:25-cv-* ) Date: November 7, 2025  
 32 *06480-CRB,* ) Time: 10:00 a.m.  
 33 \_\_\_\_\_ ) Courtroom: 6 – 17th Floor  
 34 *Et al* )  
 35 \_\_\_\_\_ )

---

**DECLARATION OF STEVEN S. SCHULTE**

I, Steven S. Schulte declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for Jane Doe NLG (N.K.), Jane Doe NLG (B.D.), and Jane Doe NLG (M.E.) in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
2. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with PTO 5.
3. Our office has made significant effort to reach these Plaintiffs including numerous phone calls, emails, texts, written letters, and address searches.
4. Jane Doe NLG (N.K.) and Jane Doe NLG (B.D.)'s ride receipts were submitted and produced on September 29, 2025. Counsel would therefore dispute their inclusion on Uber's list of delinquencies for their Motion, as well as respectfully request for their exclusion on any future entry of dismissal by the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 10, 2025, in Dallas, Texas.

NACHAWATI LAW GROUP

/s/ Steven S. Schulte  
Steven S. Schulte (TX SBN 24051306)